

SUMMARY OF ATTORNEY FEES

Williams v. Allstate
U.S.D.C. for the Western District of Oklahoma, Case No. CIV-13-828-D

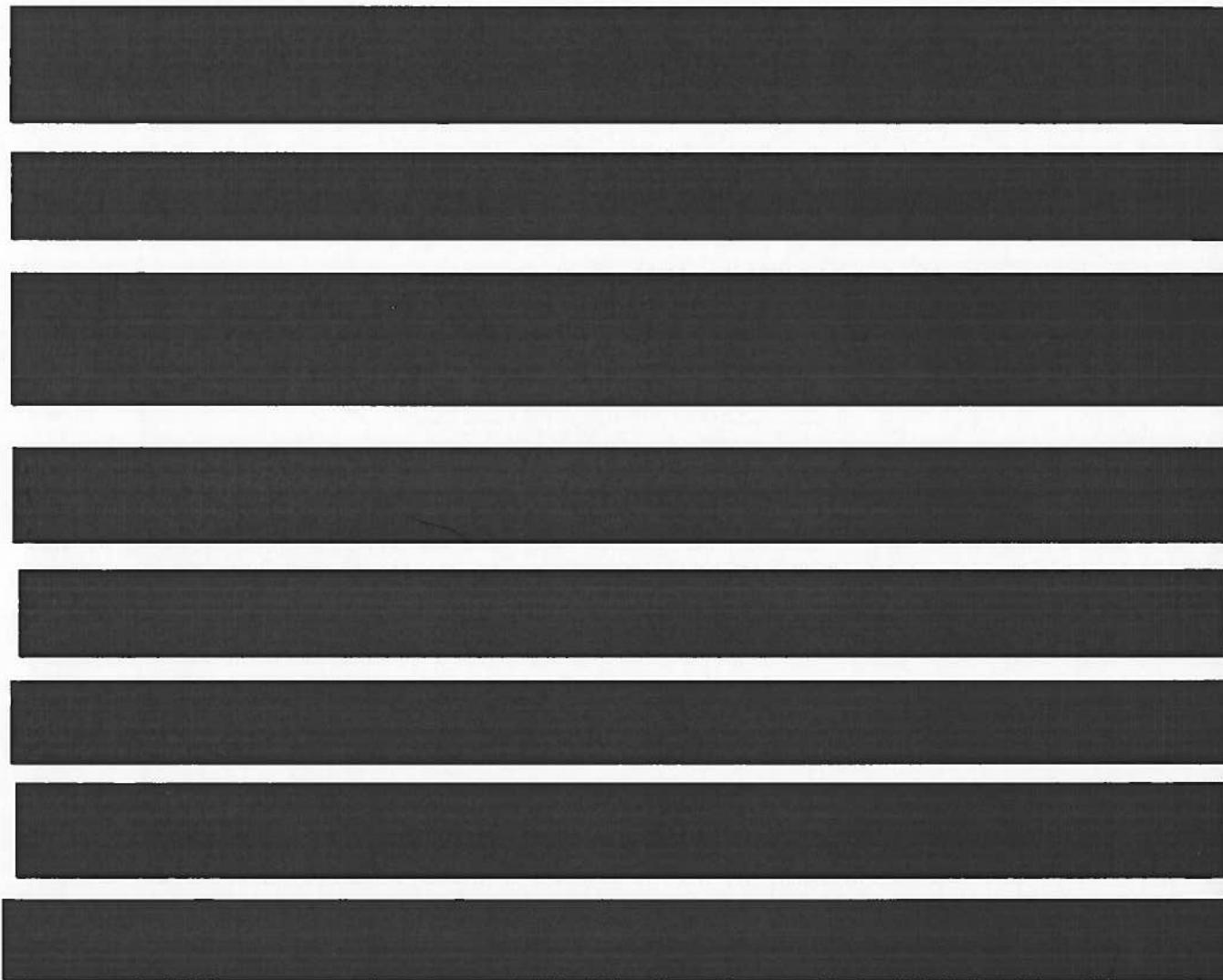
NAME	POSITION	HOURS	RATE	FEES
Candace Addington (CFH)	Paralegal	61.1	\$65.00	\$3,971.50
George Davis (GDD)	Attorney	121.7	\$185.00	\$22,514.50
Jerry Noblin, Jr. (JDN)	Attorney	168.6	\$140.00	\$23,604.00
Ronald Walker (RLW)	Director	130.8	\$185.00	\$24,198.00
TOTAL:		482.2	TOTAL:	\$74,288.00





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File No. 0749-041



4/13/2015	RLW	L310 A106	Telephone conference with John Bengston regarding discovery order and responses	0.50	\$92.50
4/13/2015	RLW	L310 A108	Telephone conference with counsel for plaintiff regarding documents CM is to produce	0.30	\$55.50

FED ID# 02-0753657

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4/14/2015	RLW	L120 A106	Telephone conference with Lynn Preston regarding REDACTED	0.50	\$92.50
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4/14/2015	RLW	L120 A106	Correspondence to Lynn Preston regarding REDACTED	0.40	\$74.00
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[REDACTED]

[REDACTED]

4/17/2015	CFH	L110 A101	Review of upcoming deadlines and depositions and identify certain tasks and document production needed prior to these deadlines	0.70	\$45.50
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[REDACTED]

4/17/2015	RLW	L120 A104	Analysis of discovery issues raised by court order including depositions	0.50	\$92.50
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4/20/2015	RLW	L330 A101	Prepare documents to use for 30b6 deposition	1.00	\$185.00
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[REDACTED]

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4/21/2015	JDN	L120 A104	Work on identifying additional document production responsive to scope of documents set by the Court	1.70	\$238.00
4/21/2015	RLW	L120 A104	Review of additional op reports to determine responsiveness to court order regarding discovery	0.60	\$111.00
4/21/2015	RLW	L310 A104	Review of education and training records to determine responsiveness	1.50	\$277.50



4/22/2015	RLW	L120 A106	Extended telephone conference with John Bengston regarding REDACTED REDACTED	1.40	\$259.00
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4/22/2015	RLW	L120 A103	Correspondence to Denise Nichols regarding training history	0.30	\$55.50
4/22/2015	RLW	L120 A106	Correspondence to Dan Hoffman regarding REDACTED REDACTED	0.30	\$55.50
4/22/2015	RLW	L120 A106	Telephone conference with Denise Nichols regarding discovery issue REDACTED	0.30	\$55.50
4/22/2015	RLW	L120 A106	Telephone conference with Dan Hoffman regarding Dana Maness REDACTED	0.30	\$55.50
4/23/2015	RLW	L120 A104	Work on education and training documents for production ordered by the court	1.00	\$185.00
4/23/2015	RLW	L120 A104	Review of plaintiffs' response and exhibits to our motion to compel	0.60	\$111.00

4/24/2015	CFH	L110 A106	Telephone call with Denise Nichols regarding REDACTED	0.20	\$13.00
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4/24/2015	RLW	L120 A104	Review personnel files REDACTED for responsiveness to court order	REDACTED for responsiveness to	1.50	\$277.50
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4/27/2015	CFH	L110 A106	Email and telephone call to Dana Maness regarding list of training courses		0.20	\$13.00
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4/27/2015	RLW	L120 A104	Review of CD of documents for responsiveness to cost containment or medical management document request		2.00	\$370.00
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4/27/2015	RLW	L230 A108	Telephone conference with counsel for plaintiff regarding MSJ and depositions		0.40	\$74.00
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4/27/2015	RLW	L120 A106	Correspondence to John Bengston regarding conference with counsel		0.30	\$55.50
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4/27/2015	RLW	L120 A104	Analysis of 30b6 issues for witness identifying and discussing schedule of documents		0.80	\$148.00
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4/27/2015	RLW	L120 A104	Review of documents for responsiveness to education and training records production	1.00	\$185.00
4/28/2015	CFH	L320 A104	Review of additional documents for production pursuant to Court Order REDACTED	3.50	\$227.50
4/28/2015	JDN	L120 A104	Analyze new documents provided by Allstate to determine what is responsive to document production request	3.20	\$448.00
4/28/2015	JDN	L120 A104	Correspondence to Lynn Preston at Allstate confirming documents provided to us	0.10	\$14.00
4/28/2015	RLW	L330 A101	Preparation for 30b6 deposition witness on 13 different categories of documents	3.00	\$555.00
4/28/2015	RLW	L310 A104	Review of documents for responsiveness and redactions for final production	2.20	\$407.00
4/29/2015	CFH	L320 A104	Review all documents to be produced pursuant to Court Order relating to personnel files and the 30 (b)6 Schedule of Documents for redactions and preparation for production	4.60	\$299.00
4/29/2015	JDN	L120 A104	Review document production for compliance with court's order and redaction of personal identifying information	0.80	\$112.00



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4/29/2015	RLW	L110 A106	Telephone conference with Denise Nichols regarding REDACTED	0.50	\$92.50
4/29/2015	RLW	L120 A104	Work on schedule of documents list and documents to be produced	1.00	\$185.00
4/30/2015	CFH	L320 A101	Review and complete remaining documents to be produced pursuant to Court Order and separately prepare documents to be sent to Dan Hoffman in preparation for 30(b)6 deposition	1.20	\$78.00
4/30/2015	CFH	L320 A104	Review of almost 5000 pages of documents produced by Cunningham and Mears law firm	2.20	\$143.00
4/30/2015	GDD	L250 A101	Analysis of hearing transcript, Court Order and new privilege log to prepare supplemental Motion to Compel production of documents Cunningham and Mears failed to include pursuant to Court Order	3.60	\$666.00
4/30/2015	JDN	L120 A104	Analyze Plaintiff's new privilege log and arguments for why listed materials is not protected	1.90	\$266.00
4/30/2015	RLW	L330 A106	Correspondence to Dan Hoffman regarding 30b6	0.50	\$92.50
4/30/2015	RLW	L330 A108	Telephone conference with counsel for plaintiff regarding depositions and scheduling order	0.40	\$74.00
4/30/2015	RLW	L320 A104	Review of portion of box of documents received from plaintiff	2.50	\$462.50
4/30/2015	RLW	L120 A104	Work on motion to compel plaintiff to comply with court order	1.00	\$185.00

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STATEMENT FOR PROFESSIONAL SERVICES RENDERED

<u>Date</u>	<u>Timekeeper</u>	<u>Task</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
5/01/2015	CFH	L110 A104	Review of our subpoena to Cunningham & Mears, our motion to compel, the motion to quash and the Court's Order for specific mention of communications with bad faith counsel and Cunningham & Mears characterizations of what our subpoena asked for to identify specific language to support a motion to enforce discovery order	1.60	\$104.00
5/01/2015	GDD	L250 A101	Review of new "privilege log" and analysis of Plaintiff's new position regarding compliance with the Court's Order of April 9, 2015 for preparation of additional motion to compel	2.80	\$518.00
5/01/2015	JDN	L120 A104	Review correspondence from Plaintiff's counsel regarding document production	0.20	\$28.00
5/01/2015	RLW	L120 A108	Correspondence to plaintiff counsel regarding documents	0.50	\$92.50
5/01/2015	RLW	L120 A104	Compare new privilege log to documents produced and prior logs to determine compliance with court order	2.40	\$444.00

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5/01/2015	RLW	L120 A106	Correspondence to John Bengston regarding documents production	0.30	\$55.50
5/02/2015	GDD	L250 A103	Draft portion of Motion to Compel addressing Plaintiff's position that the Court's Order does not apply to previously undisclosed Cunningham & Mears file documents	4.20	\$777.00
5/02/2015	JDN	L120 A104	Analysis of Plaintiff's refusal to comply with Court's order, options available to obtain compliance, and possible motion to compel	1.20	\$168.00



5/04/2015	CFH	L110 A104	Review and analysis of all eight privilege logs provided by Cunningham & Mears for changes in descriptions regarding the contents of certain documents	1.00	\$65.00
5/04/2015	GDD	L250 A103	Draft Motion to Compel argument that communications between bad faith counsel and Ryan Cunningham was part of original Order	3.60	\$666.00
5/04/2015	JDN	L120 A104	Analysis of Plaintiff's new privilege log with older privilege logs to determine which entries have been changed to allege relation to bad faith suit work	1.30	\$182.00
5/04/2015	JDN	L120 A104	Analyze 963 pages of Plaintiff's new document production	4.20	\$588.00

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5/04/2015	JDN	L120 A104	Review correspondence from Plaintiff's counsel requesting specific documents be produced	0.10	\$14.00
5/04/2015	RLW	L120 A104	Review of portion of documents produced by plaintiff pursuant to court order	2.50	\$462.50
5/04/2015	RLW	L120 A103	Work on motion to enforce court order	3.00	\$555.00
5/04/2015	RLW	L120 A106	Correspondence to John Bengston regarding plaintiff response	0.50	\$92.50
5/05/2015	CFH	L320 A101	Prepare all important documents identified in Cunningham & Mears document production for preparation of Allstate's Motion to Enforce the Court's Order	1.30	\$84.50



5/05/2015	CFH	L110 A104	Identify any items listed on prior privilege logs that are newly described in the new privilege log and prepare chart for comparison as exhibit to Allstate's Motion to Enforce the Court's Discovery Order	1.80	\$117.00
5/05/2015	CFH	L250 A103	Work on Motion to Enforce the Court's Discovery Order and exhibits	0.80	\$52.00



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5/05/2015	CFH	L110	Email and telephone call with Lynn Preston	0.20	\$13.00
		A106	regarding REDACTED		
			REDACTED		



5/05/2015	JDN	L120	Work on motion regarding enforcement of Court's	3.60	\$504.00
		A104	discovery order		
5/05/2015	JDN	L120	Analyze arguments for why Plaintiff's newly alleged	1.60	\$224.00
		A104	protected materials are not protected by privilege		
5/05/2015	JDN	L120	Review an additional 1050 pages from Plaintiff's	3.40	\$476.00
		A104	new document production		
5/05/2015	RLW	L120	Work on motion to enforce	2.00	\$370.00
		A103			
5/05/2015	RLW	L120	Analysis of claims by plaintiff relating to document	1.00	\$185.00
		A104	production		
5/05/2015	RLW	L120	Telephone conference with Lynn Preston regarding	0.60	\$111.00
		A106	document production		





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5/05/2015	RLW	L120 A104	Review of issues raised by plaintiff counsel regarding document production	0.50	\$92.50
5/06/2015	CFH	L320 A104	Review of document production sent to Plaintiff to identify specific documents Plaintiff claims is "missing" from production and identify each by Bates numbers	0.50	\$32.50
5/06/2015	JDN	L120 A104	Review correspondence from Plaintiff's counsel regarding Allstate's document production	0.20	\$28.00
5/06/2015	JDN	L120 A104	Work on new list of documents Plaintiff counsel has requested be produced	0.30	\$42.00
5/06/2015	JDN	L120 A104	Analyze Plaintiff's Amended Notice for Corporate Representative Deposition listing new topics	0.20	\$28.00
5/06/2015	JDN	L120 A104	Review Plaintiff's response brief and identify potential arguments for Allstate's Reply brief in support of motion to comply with Court's order	1.50	\$210.00
5/06/2015	RLW	L120 A106	Correspondence to Dan Hoffman regarding documents	0.30	\$55.50
5/06/2015	RLW	L330 A108	Correspondence to plaintiff counsel regarding discovery issues	0.50	\$92.50
5/06/2015	RLW	L330 A106	Correspondence to John Bengston regarding discovery issues	0.30	\$55.50



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5/06/2015	RLW	L120 A104	Review of plaintiff's response brief	1.00	\$185.00
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5/06/2015	RLW	L120 A104	Work on reply brief regarding court ordered production	1.00	\$185.00
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5/07/2015	GDD	L210 A103	Draft Reply to Plaintiff's Response on compliance with April 9, 2015 Order on discovery	1.50	\$277.50
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5/07/2015	JDN	L120 A104	Review correspondences from Plaintiff's counsel regarding pending depositions	0.20	\$28.00
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5/07/2015	JDN	L120 A104	Analyze whether all pre-hearing privilege log entry descriptions involving bad faith counsel were changed in new post-hearing privilege log	0.60	\$84.00
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5/07/2015	JDN	L120 A104	Work on reply brief in support of Motion to Enforce Court Order	1.70	\$238.00
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5/07/2015	JDN	L120 A104	Work on counter-arguments to Plaintiff's response brief	1.90	\$266.00
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5/07/2015	RLW	L120 A104	Work on reply brief including review off numerous prior communications	1.50	\$277.50
5/07/2015	RLW	L120 A103	Work on reply brief	1.00	\$185.00
5/07/2015	RLW	L120 A108	Multiple communications with plaintiff counsel regarding numerous discovery issues	1.50	\$277.50
5/07/2015	RLW	L120 A103	Work on response to pl;plaintiff's motion for extension	1.00	\$185.00

5/08/2015	CFH	L110 A104	Review of multiple email communications with Plaintiff's counsel regarding depositions, specifically Plaintiff's experts deposition and extension of deadlines in preparation for response to Plaintiff's Motion to Extend Time to File Response to Defendant's Motion for Summary Judgment	0.60	\$39.00
5/08/2015	CFH	L110 A106	Email correspondence with Lynn Preston REDACTED in preparation for 30(b)6 deposition	0.40	\$26.00
5/08/2015	JDN	L120 A104	Work on document production issues, including confirming that all responsive documents have been provided to us	0.60	\$84.00
5/08/2015	JDN	L120 A104	Work on identifying documents and facts needed for Allstate's motion regarding discovery and Daubert deadlines	0.80	\$112.00

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5/08/2015	RLW	L120 A104	Work on response to plaintiff's motion for extension	1.00	\$185.00
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5/08/2015	RLW	L330 A106	Extended telephone conference with Lynn Preston regarding 30b6 issues	0.60	\$111.00
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5/08/2015	RLW	L120 A106	Telephone conference with John Bengston REDACTED REDACTED	0.60	\$111.00
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5/08/2015	RLW	L120 A101	Prepare for conference call	0.50	\$92.50
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5/09/2015	JDN	L120 A104	Review materials and prepare Allstate's motion to extend discovery and Daubert motion deadline and exhibits	2.80	\$392.00
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5/11/2015	CFH	L250 A103	Work on Allstate's Motion to Extend Discovery and Daubert Motion Deadlines and Allstate's Response to Plaintiff's Motion to Extend Response to Motion for Summary Judgment as well as identifying exhibits	0.60	\$39.00
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5/11/2015	JDN	L120 A104	Review Plaintiff's motion for extension to file response to Allstate's motion for summary judgment and prepare response brief	0.80	\$112.00
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5/11/2015 RLW L120 Work on response to plaintiff's motion for extension 1.20 \$222.00
A103 and defendant's motion

5/11/2015 RLW L330 Extended telephone conference with Dan Hoffman 1.30 \$240.50
A106 for deposition preparation

5/11/2015 RLW L330 Review of material for Dan Hoffman deposition 0.60 \$111.00
A101 preparation

5/12/2015 CFH L210 Work on Subpoena to Testify at a Deposition to 1.30 \$84.50
A103 Mark Romano, the Notice of Subpoena and the
Exhibit A listing documents to bring to deposition

5/12/2015 RLW L120 Review of documents regarding 30b6 deposition 0.80 \$148.00
A104



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5/13/2015	RLW	L320 A104	Work on production of additional documents regarding 30b6 deposition	1.40	\$259.00
5/13/2015	RLW	L120 A104	Review of documents provided by Lynn Preston	0.60	\$111.00
5/13/2015	RLW	L120 A104	Compare claim history to documents provided by Lynn Preston in preparation for 30b6 deposition	1.00	\$185.00
5/14/2015	CFH	L320 A104	Review and prepare additional documents for production to Plaintiff	0.40	\$26.00
5/14/2015	JDN	L120 A104	Work on new document production responsive to Plaintiff's request for production	0.40	\$56.00
5/14/2015	JDN	L120 A104	Review more than 1200 additional pages of Plaintiff's document production for evidence to support defenses	3.60	\$504.00

5/14/2015	JDN	L120 A104	Work on identifying options for resolving impasse with Plaintiff's counsel over motion to enforce court's order	0.40	\$56.00
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5/14/2015	RLW	L120 A103	Correspondence to John Bengston regarding order for hearing	0.70	\$129.50
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5/14/2015	RLW	L330 A108	Multiple correspondence with counsel for plaintiff regarding discovery and other issues	2.30	\$425.50
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5/14/2015	RLW	L120 A104	Develop strategy in response to court's order for hearing	1.00	\$185.00
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5/14/2015	RLW	L120 A104	Analysis of documents provided by Lynn Preston	1.50	\$277.50
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5/15/2015	JDN	L120 A104	Review Plaintiff's privilege logs for key dates and entries demonstrating involvement by bad faith counsel in handling of med-pay claim	0.80	\$112.00
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5/15/2015	JDN	L120 A104	Analyze remaining 1500+ documents provided by Plaintiff's counsel in response to Judge's order	3.30	\$462.00
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5/15/2015	RLW	L120 A104	Conference at plaintiff counsel office to review documents ordered to be produced by the court but which plaintiff still objects	2.50	\$462.50
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5/15/2015	RLW	L120 A101	Prepare for inspection of documents including review of all prior privilege logs	0.70	\$129.50
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5/15/2015	RLW	L330 A108	Communication with plaintiff counsel regarding motion for extending depositions	0.50	\$92.50
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5/16/2015	RLW	L330 A108	Correspondence to plaintiff counsel regarding agreement on discovery	0.50	\$92.50
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5/18/2015	JDN	L120 A104	Analyze Plaintiff's insurance policy for provisions regarding when coverages are primary and excess	0.40	\$56.00
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5/18/2015	JDN	L120 A104	Analyze whether med-pay policy provision regarding when substitute auto and non-owned auto are involved the policy will be excess has been enforced by courts	3.40	\$476.00
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5/19/2015	CFH	L110 A101	Review and isolate a group of documents from the Cunningham and Mears document production to be used for trial and/or the deposition of Marcus Mears	0.60	\$39.00
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5/19/2015	GDD	L320 A104	Analysis of Plaintiff's newly produced documents to determine compliance with court order	4.20	\$777.00
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5/19/2015	JDN	L120 A104	Work on issues involving Allstate's motion to enforce and Plaintiff's new document production of allegedly privileged materials	0.90	\$126.00
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5/19/2015	JDN	L120 A104	Prepare correspondence to Plaintiff's counsel detailing additional document production	0.40	\$56.00
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5/19/2015	JDN	L120 A104	Work on potential disputed issues for Allstate's corporate representative deposition	1.10	\$154.00
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5/19/2015	RLW	L120 A101	Prepare material for deposition preparation for Lynn Preston	1.00	\$185.00
5/19/2015	RLW	L120 A104	Analysis of issues relating to 30b6 deposition of Cunningham & Mears including review of documents produced by C&M	2.00	\$370.00
5/20/2015	CFH	L250 A103	Work on Motion to Withdraw Motion to Extend Deadlines and proposed Order due to recent agreement with Plaintiff and filing of a Joint Motion to Extend Deadlines	0.30	\$19.50
5/20/2015	CFH	L330 A101	Prepare documents needed for preparing Dan Hoffman and Lynn Preston for deposition	2.40	\$156.00
5/20/2015	JDN	L120 A104	Identify documents from Plaintiff's privilege log that Allstate should challenge and have ordered produced	0.80	\$112.00
5/20/2015	JDN	L120 A104	Work on notice and motion to Court regarding pending motions for extension submitted by the parties	0.30	\$42.00
5/20/2015	JDN	L120 A104	Analyze legal authority cited by Plaintiff counsel for why med pay benefits could not be distributed upon receipt from Allstate	0.80	\$112.00

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5/20/2015	JDN	L120 A104	Review documents sent by Plaintiff's counsel regarding pending deadlines and motion to file with court	0.20	\$28.00
5/20/2015	RLW	L210 A103	Work on joint motion for extension of specific dates	0.60	\$111.00
5/20/2015	RLW	L330 A108	Telephone conference with counsel for plaintiff regarding C&M documents	0.50	\$92.50
5/20/2015	RLW	L120 A104	Prepare proposal for resolution of C&M document production issues	0.50	\$92.50
5/20/2015	RLW	L450 A108	Telephone conference with plaintiff counsel and court case manager regarding hearing	0.30	\$55.50



5/21/2015	CFH	L330 A101	Review of certain file material and preparation of additional documents to be sent to Birmingham for depositions of Dan Hoffman and Lynn Preston	1.40	\$91.00
5/21/2015	CFH	L110 A103	Review of documents from multiple sources and begin preparation of credit issue timeline	1.70	\$110.50
5/21/2015	JDN	L120 A104	Work on proposed order to send to Federal Court	0.10	\$14.00



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5/21/2015	RLW	L120 A106	Extended telephone conference with John Bengston regarding REDACTED	0.50	\$92.50
5/22/2015	CFH	L110 A108	Email correspondence with Denton's office regarding Mr. Romano's deposition and recent Order filed granting extensions of deadlines	0.10	\$6.50

5/22/2015	CFH	L110 A103	Continue review of documents and preparation of credit issue timeline	1.80	\$117.00
5/22/2015	JDN	L120 A104	Prepare joint motion regarding discovery disputes and striking of hearing	1.40	\$196.00
5/22/2015	JDN	L120 A104	Correspondence to Plaintiff's counsel regarding motion	0.10	\$14.00
5/22/2015	JDN	L120 A104	Analyze Plaintiff's underwriting file sent by Allstate in response to Plaintiff's requests for production of documents	0.80	\$112.00
5/25/2015	RLW	L330 A101	Prepare for depositions of Birmingham witnesses	2.00	\$370.00

5/26/2015	CFH	L320 A101	Work on recently received documents for production to Plaintiff and email to Plaintiff regarding same	0.40	\$26.00
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[REDACTED]

[REDACTED]

[REDACTED]

5/26/2015	RLW	L330 A106	Two Telephone conference with Dan Hoffman regarding deposition preparation	0.50	\$92.50
5/27/2015	CFH	L210 A103	Work on proposed order regarding Joint Motion Regarding Discovery Dispute and Hearing	0.30	\$19.50
5/27/2015	CFH	L110 A108	Email correspondence to Judge's clerk regarding proposed Order	0.10	\$6.50
5/27/2015	JDN	L120 A104	Analysis of more than 100 documents to which Plaintiff is claiming privilege to determine arguments for brief for why not protected	3.90	\$546.00
5/27/2015	JDN	L120 A104	Correspondence to Plaintiff's counsel regarding status of motion	0.10	\$14.00
5/27/2015	JDN	L120 A104	Telephone call from Plaintiff's counsel discussing documents for which privilege may be waived	0.20	\$28.00
5/27/2015	JDN	L120 A104	Work on order to send to federal court granting motion	0.10	\$14.00

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5/27/2015	RLW	L330 A109	Deposition of Dan Hoffman in Birmingham	7.00	\$1,295.00
5/27/2015	RLW	L120 A106	Conference with Dan Hoffman after deposition	0.50	\$92.50
5/27/2015	RLW	L330 A106	Extended telephone conference with Lynn Preston regarding her deposition	0.70	\$129.50
5/28/2015	RLW	L330 A109	Deposition of Lynn Preston	4.00	\$740.00
5/28/2015	RLW	L120 A106	Conference with Lynn Preston after deposition	0.40	\$74.00

5/29/2015	CFH	L110 A106	Email correspondence to Lynn Preston and telephone call with Bob Lamb regarding certain documents identified during Lynn's deposition and requested to be produced by Plaintiff	0.50	\$32.50
5/29/2015	RLW	L330 A103	Prepare reports on depositions	1.30	\$240.50



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STATEMENT FOR PROFESSIONAL SERVICES RENDERED

<u>Date</u>	<u>Timekeeper</u>	<u>Task</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
6/01/2015	CFH	L110 A104	Review of additional documents received from Lynn Preston relating to document production requested by Plaintiff during her deposition	0.50	\$32.50
6/01/2015	JDN	L120 A104	Conference call with Lynn Preston regarding NextGen screenshots and related materials	0.50	\$70.00
6/01/2015	JDN	L120 A104	Work on response to Plaintiff counsel's request that documents mentioned in deposition be produced	0.70	\$98.00
6/01/2015	RLW	L120 A106	Four telephone discussions with Lynn Preston regarding Nextgen documents and screen shot issues	2.00	\$370.00
6/01/2015	RLW	L120 A104	Work on issues relating to 30b6 deposition testimony and document production regarding RFP 4 and	2.50	\$462.50

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[REDACTED]

[REDACTED]

[REDACTED]

6/02/2015	JDN	L120 A104	Prepare correspondence to Plaintiff's counsel regarding additional document production	0.20	\$28.00
6/02/2015	JDN	L120 A104	Work on determining whether new documents provided by Allstate are discoverable	1.60	\$224.00
6/02/2015	RLW	L120 A104	Analysis of issues dealing producing Nextgen information	2.00	\$370.00
6/02/2015	RLW	L320 A108	Correspondence to plaintiff counsel regarding documents	0.40	\$74.00
6/02/2015	RLW	L120 A106	Extended telephone conference with John Bengston regarding REDACTED REDACTED	1.00	\$185.00
6/02/2015	RLW	L330 A106	Extended telephone conference with Denise Nichols regarding preparation for deposition	1.60	\$296.00

[REDACTED]

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6/03/2015	JDN	L120	Prepare Amended Privilege Log for new entries of	0.50	\$70.00
		A104	protected information		

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

6/11/2015	JDN	L120	Work on support for argument that documents	3.40	\$476.00
		A104	showing person stands to gain financially from outcome of case are discoverable		

6/11/2015	JDN	L120	Review disputed documents for which counsel	1.60	\$224.00
		A104	claims privilege and prepare groupings of same for motion		

6/11/2015	JDN	L120	Work on outline of arguments and supporting	1.50	\$210.00
		A104	evidence for Motion To Enforce Court Order		

[REDACTED]

6/12/2015	CFH	L320	Review of Cunningham and Mears documents	0.70	\$45.50
		A104	provided for review under privilege claims and preparation of documents waived for part of the file		



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6/12/2015	CFH	L110 A104	Review of records from Cunningham & Mears and continue adding additional information to timeline relating to credit claim issue and all correspondence involved	1.60	\$104.00
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6/12/2015	JDN	L120 A104	Work on support for argument that attorney client privilege does not protect communications to third-party medical providers and related work product issues	0.80	\$112.00
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6/12/2015	JDN	L120 A104	Telephone call with plaintiff counsel regarding certain objections to alleged privileged documents	0.20	\$28.00
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6/12/2015	JDN	L120 A104	Work on argument for Motion To Enforce that med pay counsel's communications with bad faith counsel were known to be part of the file already ordered to be produced by Court	3.20	\$448.00
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6/15/2015	JDN	L120 A104	Work on Motion To Enforce argument that Plaintiff's arguments merely rehash what has already been considered and rejected by the Court	2.10	\$294.00
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6/15/2015	JDN	L120 A104	Work on argument for Motion To Enforce that documents showing a witness's financial interest in	3.10	\$434.00
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documents showing a witness's financial interest in
outcome of case are relevant and discoverable

6/16/2015	JDN	L120 A104	Correspondence to and telephone call with Plaintiff counsel regarding objections on second set of disputed documents	0.20	\$28.00
6/16/2015	JDN	L120 A104	Prepare Motion To Enforce argument that counsel's draft petitions and communications regarding strategic considerations are relevant and discoverable	3.30	\$462.00
6/16/2015	RLW	L310 A103	Work on brief regarding CM document production	0.60	\$111.00
6/17/2015	CFH	L250 A103	Work on sealed Motion to Enforce Court's Discovery Order and exhibits	2.30	\$149.50
6/17/2015	GDD	L250 A103	Draft and edit Motion to Compel Production of Documents	2.50	\$462.50
6/17/2015	JDN	L120 A104	Telephone call to Plaintiff's counsel regarding sealed exhibit	0.10	\$14.00
6/17/2015	JDN	L120 A104	Work on amendments to arguments for Motion To Enforce Court's Order	3.80	\$532.00
6/17/2015	JDN	L120 A104	Prepare legal and fact citations for brief and confirm exhibits for filing	0.70	\$98.00

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6/17/2015	RLW	L120 A103	Work on motion to compel CM documents	1.00	\$185.00
6/18/2015	JDN	L120 A104	Work on amended Privilege Log to send to Plaintiff counsel	0.20	\$28.00
6/18/2015	JDN	L120 A104	Review claim history report for involvement by certain Allstate employees	0.30	\$42.00
6/18/2015	JDN	L120 A104	Correspondence to Plaintiff's counsel regarding privilege log	0.10	\$14.00
6/19/2015	CFH	L210 A104	Review of recent depositions and important documents for preparation of Reply brief on Allstate's Motion to Enforce Court's Discovery Order	0.30	\$19.50
6/22/2015	CFH	L320 A104	Review and redact certain information from Cunningham & Mears document production waived by Marcus Mears	0.40	\$26.00
6/22/2015	CFH	L110 A104	Review of certain documents and pleadings for relevant material for preparation of Reply to Plaintiffs Response to Motion for Summary Judgment	1.00	\$65.00
6/22/2015	GDD	L240 A104	Review and analyze deposition of Dan Hoffman for preparation of anticipated arguments in Reply brief on our motion for summary judgment	2.40	\$444.00
6/22/2015	JDN	L120 A104	Work on new evidence to support arguments in summary judgment motion obtained from Plaintiff's latest document production	2.10	\$294.00



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6/23/2015	GDD	L240 A104	Review and analyze deposition and exhibits of Denise Nichols for preparation of Reply brief on motion for summary judgment	2.50	\$462.50
6/23/2015	JDN	L120 A104	Analyze Plaintiff's pleadings and correspondence for arguments and evidence Plaintiff will make to support bad faith allegations and defeat summary judgment	3.70	\$518.00
6/23/2015	JDN	L120 A104	Work on selecting documents obtained by court order for list of key documents for defense of case	0.50	\$70.00

6/24/2015	GDD	L240 A104	Review and analyze Lynn Preston's deposition and exhibits for preparation of Reply brief on motion for summary judgment	2.20	\$407.00
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6/24/2015	JDN	L120 A104	Review case law support for argument that it is reasonable for insurer to rely on claimant counsel's statements that he would provide medical records when treatment is complete	0.30	\$42.00
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6/24/2015	JDN	L120 A104	Review policy for provisions requiring claimant to provide a medical authorization and submit to an independent medical examination	0.20	\$28.00
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6/24/2015	JDN	L120 A104	Work on identifying factual scenarios regarding when conduct is viewed as negligence and cannot form basis for a bad faith claim	1.60	\$224.00
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6/25/2015	JDN	L120 A104	Analysis of Plaintiff's stated arguments regarding bad faith and how to address in brief	1.60	\$224.00
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6/25/2015	RLW	L240 A104	Work on reply to plaintiff response to our motion for summary judgment	1.00	\$185.00
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6/26/2015	CFH	L110 A106	Telephone call and email to Dan Hoffman regarding his deposition transcript	0.20	\$13.00
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6/26/2015	CFH	L110 A104	Review of privilege documents waived and complete group of "important" documents	0.30	\$19.50
6/26/2015	GDD	L240 A104	Review and analyze multiple documents from Cunningham and Mears file to prepare for Reply brief on motion for summary judgment	4.60	\$851.00
6/26/2015	JDN	L120 A104	Work on argument that complying with claimant attorney's instructions does not equate to delay in payment, is not bad faith and that conflicting versions of events between plaintiff and defendant is only a legitimate dispute	1.20	\$168.00
6/26/2015	JDN	L120 A104	Review Plaintiff's document production and bad faith attorney's document production and create list of evidence to support reply brief arguments	3.90	\$546.00
6/26/2015	RLW	L120 A104	Identify CM and other documents for reply brief	2.80	\$518.00



6/29/2015	CFH	L240 A104	Review and identify specific documents to be used in Allstate's Reply brief to Motion for Summary Judgment	0.50	\$32.50
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6/29/2015	JDN	L120	Continue analysis of Federal and State cases	3.90	\$546.00
		A104	regarding what factual scenarios constitute		
			granting summary judgment because the parties		
			legitimately disputed why payment on the claim		
			was delayed		

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

6/30/2015	GDD	L240	Initial review and analysis of Plaintiff's arguments in	2.70	\$499.50
		A104	Response brief on motion for summary judgment		
6/30/2015	JDN	L120	Work on review of Plaintiff's Response Brief to	2.40	\$336.00
		A104	Allstate's Motion For Summary Judgment		
6/30/2015	RLW	L120	Analysis of issues for reply brief	2.00	\$370.00
		A104			



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STATEMENT FOR PROFESSIONAL SERVICES RENDERED

<u>Date</u>	<u>Timekeeper</u>	<u>Task</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
7/01/2015	CFH	L110 A104	Review of Plaintiff's Response to Motion for Summary Judgment and identify certain areas that will be addressed and organized within our Reply brief	2.00	\$130.00
7/01/2015	CFH	L110 A104	Review of Dana Colvin and Ryan Cunningham's deposition and exhibits from motion for summary judgment in preparation for Reply brief	1.40	\$91.00
7/01/2015	GDD	L240 A104	Review of Plaintiff's Response brief to motion for summary judgment and analysis of cited authority	4.80	\$888.00
7/01/2015	JDN	L120 A104	Analyze Plaintiff's document production for evidence supporting Allstate's argument that there was no bad faith delay in payment of claim	2.30	\$322.00
7/01/2015	JDN	L120 A104	Work on finding evidence from Plaintiff's document production supporting Allstate's argument that it is not the proximate cause of Plaintiff's alleged credit damage	1.40	\$196.00
7/01/2015	RLW	L120 A104	Analysis of issues raised in plaintiff's response brief	2.50	\$462.50

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7/02/2015	GDD	L240 A103	Prepare reply to allegations of Defendant's alleged delay in seeking medical records	4.30	\$795.50
7/02/2015	JDN	L120 A104	Analyze Plaintiff's extensive response brief to Allstate's Motion For Summary Judgment	4.30	\$602.00
7/02/2015	RLW	L240 A103	Work on reply brief	0.40	\$74.00
7/03/2015	GDD	L240 A103	Draft response to allegations that Defendant placed "impermissible obstacles" to avoid payment of benefits	4.60	\$851.00

7/06/2015	GDD	L240 A103	Draft and revise reply to Plaintiff's argument that insurance department regulations and state statutes establish "bad faith"	5.50	\$1,017.50
7/06/2015	JDN	L120 A104	Analyze Plaintiff's cited legal authorities in his response brief to Allstate's Motion For Summary Judgment	3.90	\$546.00



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7/07/2015	GDD	L240 A103	Prepare analysis and draft of Reply addressing Plaintiff's interpretation of "other insurance" provision	4.60	\$851.00
7/07/2015	JDN	L120 A104	Work on response to Plaintiff's list of undisputed material facts	2.60	\$364.00
7/07/2015	JDN	L120 A104	Work on argument explaining why Allstate was entitled to determine whether Plaintiff's med-pay was excess or primary per "If There Is Other Insurance" provision in his policy	2.30	\$322.00
7/07/2015	JDN	L120 A104	Analyze whether a summary judgment movant must respond to a non-movant's list of undisputed material facts	0.90	\$126.00

7/08/2015	GDD	L240 A104	Review of Plaintiff's arguments on "legal necessity" and the "marshalling" of funds and draft reply	5.30	\$980.50
7/08/2015	JDN	L120 A104	Work on argument that alleged conduct is not bad faith because it does not arise above level of negligence and the parties legitimately disputed	2.50	\$350.00

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the underlying issues

7/08/2015	RLW	L120 A106	Correspondence to John Bengston regarding plaintiff request for discovery extension	0.20	\$37.00
7/08/2015	RLW	L120 A104	Review of CM response to request for additional documents	0.50	\$92.50
7/08/2015	RLW	L330 A104	Review of plaintiff application for extension of discovery	0.50	\$92.50
7/09/2015	GDD	L250 A104	Review and analyze issues raised in Plaintiff's Motion for Extended Discovery Deadline	1.50	\$277.50
7/09/2015	GDD	L250 A104	Review and analyze claim file and deposition testimony in preparation of factual issues in Response brief on extended discovery	2.80	\$518.00
7/09/2015	GDD	L250 A103	Review and revisions to Allstate's Reply to Plaintiff's Response to Motion for Summary Judgment	0.80	\$148.00
7/09/2015	JDN	L120 A104	Work on argument that for bad faith claim court must first determine that actions complained of could be considered tortious and that bad faith is above mere negligence but below recklessness	2.30	\$322.00



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7/10/2015	CFH	L240 A103	Work on additions to Allstate's Reply to Plaintiff's Response in Opposition to Motion for Summary Judgment	1.00	\$65.00
7/10/2015	GDD	L250 A103	Prepare additional edits and exhibit references to Reply brief on motion for summary judgment	2.30	\$425.50
7/10/2015	JDN	L120 A104	Analyze Plaintiff's Response to Allstate's Motion to Enforce Court Order	2.90	\$406.00
7/10/2015	JDN	L120 A104	Analyze Plaintiff's application of Federal Rule of Evidence 403 to discovery issues in case	1.30	\$182.00
7/10/2015	JDN	L120 A104	Review Plaintiff's cited legal authorities in Response brief to Allstate's Motion To Enforce	1.60	\$224.00
7/10/2015	JDN	L120 A104	Work on rebuttal argument for Plaintiff's "delay of payment" argument	1.80	\$252.00
7/10/2015	JDN	L120 A104	Correspondence to Allstate regarding Reply brief in support of summary judgment	0.20	\$28.00
7/10/2015	RLW	L240 A103	Work on reply brief	1.00	\$185.00
7/13/2015	CFH	L110 A104	Review and additions to Allstate's Reply brief on motion for summary judgment	0.60	\$39.00

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7/13/2015	CFH	L240 A103	Work on review of documents and exhibits for Allstate's Reply brief on motion for summary judgment	1.50	\$97.50
7/13/2015	GDD	L250 A101	Prepare and select exhibit references supporting all factual statements in Reply brief on motion for summary judgment	3.20	\$592.00
7/13/2015	JDN	L120 A104	Analysis of whether non-movant can submit its own motion for summary judgment in its response brief by filing a list of "undisputed material facts".	1.40	\$196.00
7/13/2015	JDN	L120 A104	Work on outline of Reply brief evidence and arguments	1.30	\$182.00
7/13/2015	JDN	L120 A104	Prepare Reply brief argument that a witness's financial stake in the very case in which he is testifying is discoverable to show motive and bias, and distinguish Plaintiff's cited authority	1.40	\$196.00
7/13/2015	JDN	L120 A104	Work on Reply brief argument that Plaintiff has failed to provide any valid argument or authority to support his position that the disputed documents are not discoverable	2.10	\$294.00
7/13/2015	JDN	L120 A104	Work on final amendments to Allstate's Reply brief in support of its Summary Judgment	2.40	\$336.00
7/13/2015	RLW	L240 A103	Work on reply brief regarding causation	1.50	\$277.50
7/13/2015	RLW	L330 A106	Telephone conference with John Bengston regarding discovery	0.50	\$92.50

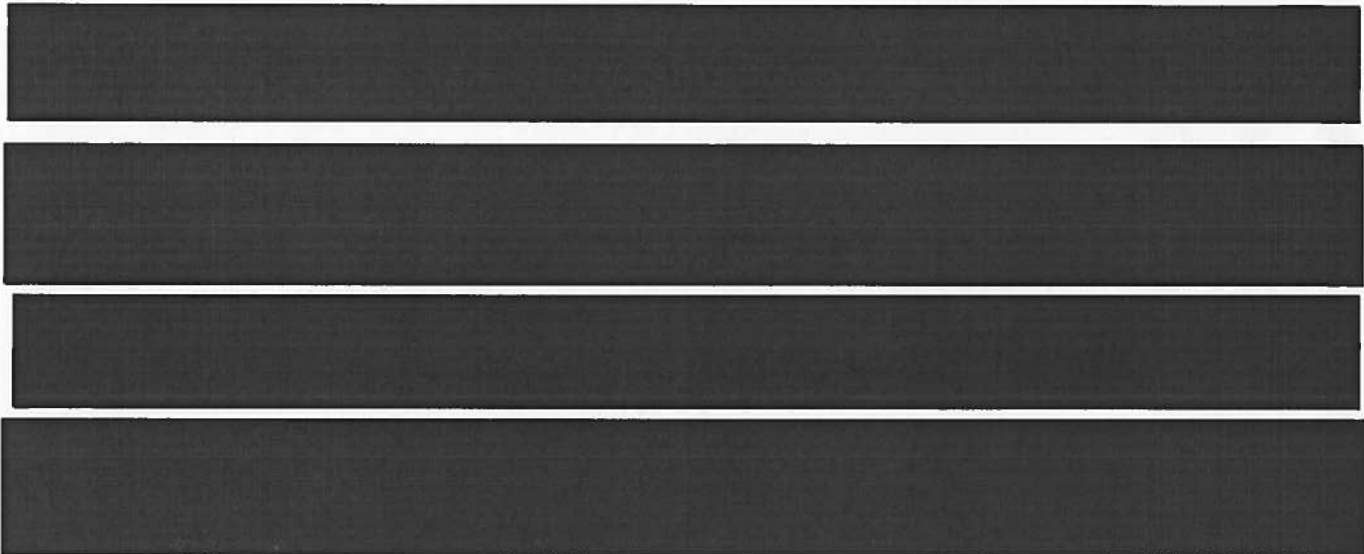
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7/14/2015	CFH	L240 A103	Work on Allstate's Reply, review of deposition testimony to be used in brief and preparation of exhibits	4.00	\$260.00
7/14/2015	JDN	L120 A104	Work on additional arguments and evidence for reply brief	1.80	\$252.00
7/14/2015	JDN	L120 A104	Prepare list of false statements made by Plaintiff in response brief to motion to enforce and collect evidence to rebut same	2.20	\$308.00
7/15/2015	CFH	L210 A103	Work on additions to Allstate's Reply in Support of Motion to Enforce Court's Discovery Order and exhibits	1.80	\$117.00





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7/15/2015	GDD	L250 A103	Edit and revise draft of Reply on Motion to Enforce Discovery Order	0.80	\$148.00
7/15/2015	JDN	L120 A104	Work on argument for Motion To Enforce Court Order that Plaintiff's use of biased and irrelevant arguments involving matters not at issue are nothing but "strawman" arguments	3.20	\$448.00
7/15/2015	JDN	L120 A104	Work on amendments to arguments for Reply brief in support of Allstate's Motion To Enforce Court's Order and collect exhibits	1.90	\$266.00



7/16/2015	CFH	L110 A104	Review of Lynn Preston's deposition transcript for testimony that may be confidential as a result of Plaintiff's recent letter challenging the confidentiality of the deposition	1.50	\$97.50
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7/16/2015	GDD	L250 A104	Review Plaintiff's brief on motion to extend discovery deadline and analyze issues to address therein with response	3.20	\$592.00
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[REDACTED]

[REDACTED]

[REDACTED]

7/17/2015	GDD	L250 A101	Prepare arguments for Response brief on extended discovery regarding Plaintiff's wrongful characterizations of "spoliation" issue	3.50	\$647.50
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[REDACTED]

[REDACTED]

[REDACTED]

7/20/2015	GDD	L250 A101	Prepare analysis and arguments for Response brief on "spoliation" addressing allegations of wrongful privilege	3.00	\$555.00
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7/20/2015	JDN	L120	Analysis of Plaintiff's claim that Allstate modified	2.40	\$336.00
		A104	documents in claim file		

7/20/2015	RLW	L120	Work on portion of brief regarding spoliation	1.30	\$240.50
		A104	allegations		

7/21/2015	CFH	L110	Review of Dana Colvin's deposition testimony	0.60	\$39.00
		A104	relating to the exhaustion letter in preparation for Response brief to Plaintiff's motion to extend discovery		

7/21/2015	GDD	L250	Prepare analysis and arguments on "spoliation"	2.20	\$407.00
		A101	issue involving potential "moot" character of request for more discovery		



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7/21/2015	JDN	L120 A104	Work on discovery issues regarding entries made on First Notice Of Loss Snapshot and NextGen screens	0.40	\$56.00
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7/22/2015	RLW	L120 A104	Review of Lynn Preston deposition for confidentiality portions	0.80	\$148.00
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7/23/2015	GDD	L250 A103	Draft first two issues of Response brief on "spoliation" of evidence issues	3.80	\$703.00
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7/23/2015	JDN	L120 A104	Work on rebuttal arguments for Plaintiff's spoliation of evidence claim	0.90	\$126.00
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7/23/2015	RLW	L310 A103	Prepare affidavit for Lynn Preston	0.90	\$166.50
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7/23/2015	RLW	L120 A108	Telephone conference with plaintiff counsel regarding Lynn Preston deposition	0.30	\$55.50
7/24/2015	CFH	L110 A104	Review specific testimony and questioning in Denise Nichols deposition relating to the First Notice of Loss Snapshot and the claim summary screen in preparation for response to Plaintiff's Motion for Discovery Extension	0.60	\$39.00

7/24/2015	GDD	L250 A103	Draft final argument on Response to "spoliation" allegations	1.30	\$240.50
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7/24/2015	RLW	L330 A103	Work on response to plaintiff's brief for more discovery	1.30	\$240.50
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7/27/2015	CFH	L250 A103	Review and additions to Allstate's Response to Plaintiff's Motion for Limited Extension of Discovery Deadline	1.00	\$65.00
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7/27/2015	GDD	L250 A103	Edit and revise "spoliation" Response brief in preparation for filing	2.30	\$425.50
7/27/2015	JDN	L120 A104	Work on response brief arguments regarding Plaintiff's motion to reopen discovery	3.20	\$448.00
7/27/2015	RLW	L330 A103	Work on response brief regarding First Notice of Loss issues	1.00	\$185.00
7/28/2015	CFH	L250 A103	Work on Allstate's Response to Plaintiff's Motion for Limited Extension of Discovery Deadline and exhibits	0.50	\$32.50
7/30/2015	CFH	L250 A103	Work on Allstate's Motion to File Document Under Seal	0.30	\$19.50
7/30/2015	CFH	L210 A103	Work on proposed Order for Allstate's Motion to File Document Under Seal	0.30	\$19.50
7/30/2015	CFH	L250 A103	Work on final edits to Allstate's Response to Plaintiff's Motion for Limited Extension of Discovery Deadline	0.50	\$32.50

7/30/2015	JDN	L120 A104	Telephone call to Plaintiff's counsel regarding exhibit protected by protective order	0.10	\$14.00
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7/30/2015	JDN	L120 A104	Work on Motion To File Exhibit Under Seal and related Order per Federal Local Rules	0.30	\$42.00
7/30/2015	JDN	L120 A104	Prepare final additions to Allstate's Response Brief to Plaintiff's Motion For Limited Discovery	1.10	\$154.00
7/30/2015	RLW	L120 A103	Work on response brief and exhibits	0.70	\$129.50
7/31/2015	JDN	L120 A104	Work on Plaintiff's objections to Allstate's discovery responses and document production	0.80	\$112.00
7/31/2015	JDN	L120 A104	Review Court's Order granting Allstate's Motion To Enforce Court Order	0.20	\$28.00



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<u>Date</u>	<u>Timekeeper</u>	<u>Task</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
8/03/2015	RLW	L120 A104	Review of court order in our favor on discovery	0.30	\$55.50
8/03/2015	RLW	L120 A106	Correspondence to John Bengston on court order	0.20	\$37.00
8/04/2015	JDN	L120 A104	Review Plaintiff's Motion To Withdraw and attached exhibit	0.20	\$28.00
8/05/2015	RLW	L120 A104	Review of plaintiff motion to withdraw	0.30	\$55.50
8/05/2015	RLW	L120 A103	Correspondence to John Bengston regarding plaintiff motion	0.30	\$55.50

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9/09/2015	JDN	L120 A104	Analyze effect of Plaintiff bad faith expert's withdrawal from case and how to defend against new expert coming in after time to designate an expert has expired	0.80	\$112.00
9/09/2015	RLW	L130 A104	Analysis of plaintiff disclosure concerning Romano	0.40	\$74.00
9/10/2015	CFH	L110 A103	Prepare letter to Plaintiff's counsel regarding Mark Romano withdrawing as expert	0.10	\$6.50
9/10/2015	RLW	L130 A108	Correspondence to plaintiff counsel regarding disclosure concerning Romano	0.50	\$92.50
9/11/2015	RLW	L120 A104	Review of letter from plaintiff counsel on expert witness withdrawal	0.30	\$55.50
9/11/2015	RLW	L110 A104	Review of case law cited by plaintiff regarding substitution of expert witnesses	0.90	\$166.50
9/17/2015	CFH	L110 A103	Prepare letter and email correspondence to Plaintiff regarding withdrawal of Mark Romano as expert	0.20	\$13.00

9/28/2015	GDD	L250 A101	Review and analyze Plaintiff's Motion to Substitute Expert Witness for preparation of Response brief	1.80	\$333.00
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9/28/2015	RLW	L130 A104	Analysis of motion to substitute expert witness filed by plaintiff	1.00	\$185.00
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9/30/2015	GDD	L250 A102	Work on brief in response to Plaintiff's motion to add expert	4.80	\$888.00
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<u>Date</u>	<u>Timekeeper</u>	<u>Task</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
10/01/2015	GDD	L250 A101	Work on Response to Plaintiff's Motion to Substitute "bad faith" expert	3.50	\$647.50
10/05/2015	GDD	L250 A103	Draft introduction to Response brief substituting "bad faith" expert	2.40	\$444.00

10/07/2015	GDD	L250 A103	Plan and prepare arguments for brief on substitution of experts	4.40	\$814.00
10/07/2015	RLW	L120 A103	Work on response to motion to substitute expert witness including review of other deposition and report by proposed expert	1.40	\$259.00

10/08/2015	GDD	L250 A103	Draft first proposition of Response to Plaintiff's Motion to Substitute Expert	4.20	\$777.00
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10/12/2015	GDD	L250 A103	Draft second proposition of Response to Plaintiff's Motion to Substitute Expert	4.00	\$740.00
10/13/2015	RLW	L130 A103	Work on motion to substitute response	1.00	\$185.00

10/14/2015	CFH	L250 A103	Work on additions to Allstate's Response to Plaintiff's Motion to Substitute Expert	0.50	\$32.50
10/14/2015	JDN	L120 A104	Work on response brief to Plaintiff's motion to substitute expert witness	1.40	\$196.00
10/15/2015	CFH	L250 A103	Work on additions to Allstate's Response to Plaintiff's Motion to Substitute Expert Witness and identify exhibits	1.80	\$117.00
10/19/2015	CFH	L250 A103	Work on final additions to Allstate's Response to Plaintiff's Motion to Substitute Expert and exhibits in preparation for filing	0.40	\$26.00
10/19/2015	RLW	L130 A103	Work on response to motion to substitute	0.50	\$92.50
10/26/2015	JDN	L120 A104	Analyze Plaintiff's Reply brief regarding substitution of experts	0.20	\$28.00

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10/26/2015	JDN	L120	Analyze Plaintiff's reply regarding substitution of	0.50	\$70.00
		A104	expert and need for sur-reply		





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<u>Date</u>	<u>Timekeeper</u>	<u>Task</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
11/09/2015	RLW	L130 A104	Review of court order regarding expert witness	0.30	\$55.50
11/10/2015	JDN	L120 A104	Review Court's order regarding motion to substitute expert witness	0.20	\$28.00

11/24/2015	RLW	L130 A104	Detailed analysis of report from new expert witness for plaintiff	2.00	\$370.00
11/24/2015	RLW	L120 A106	Correspondence to John Bengston and others regarding new expert witness report	0.50	\$92.50

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STATEMENT FOR PROFESSIONAL SERVICES RENDERED

<u>Date</u>	<u>Timekeeper</u>	<u>Task</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
[REDACTED]					
[REDACTED]					
[REDACTED]					
[REDACTED]					
9/30/2016	RLW	L120 A104	analysis of court opinion ruling on motion for summary judgment	1.00	\$185.00
9/30/2016	RLW	L120 A106	Correspondence to John Bengston regarding order of court	0.50	\$92.50
[REDACTED]					

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